

**GREENBERG TRAURIG, LLP**

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*Mark R. Newcomer, and Mark Attinger*

**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

YILAN SHI, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiffs,

v.

PAYSIGN, INC., MARK R. NEWCOMER,  
and MARK ATTINGER,

Defendants.

Case No. 2:20-cv-00553-GMN-DJA (*Shi*)  
Case No. 2:20-cv-00585-JAD-VCF (*Chase*)

**STIPULATION TO SET COORDINATED  
BRIEFING SCHEDULE AND [PROPOSED]  
ORDER**

*Shi* Action Filed: March 19, 2020

*Chase* Action Filed: March 25, 2020

LORNA CHASE, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiffs,

v.

PAYSIGN, INC., MARK R. NEWCOMER,  
and MARK ATTINGER,

Defendants.

1 Plaintiff Yilan Shi (“Shi”), Plaintiff Lorna Chase (“Chase”), and Defendants Paysign, Inc., Mark  
 2 R. Newcomer, and Mark Attinger (collectively, “Defendants”), by and through their respective counsel,  
 3 hereby stipulate as follows:

4 WHEREAS, on March 19, 2020, Shi filed the Class Action Complaint in *Yilan Shi v. Paysign, Inc.*  
 5 *et al.*, Case No. 2:20-cv-00553-GMN-DJA (the “*Shi* Action”);

6 WHEREAS, on March 25, 2020, Chase filed the Class Action Complaint in *Lorna Chase v.*  
 7 *Paysign, Inc., et al.*, Case No. 2:20-cv-00585-JAD-VCF (the “*Chase* Action”);

8 WHEREAS, on April 2, 2020, Gary Smith and Pamela Duvall (collectively, “Smith”) filed the  
 9 Class Action Complaint in *Gary Smith, et al. v. Paysign, Inc., et al.*, Case No. 2:20-cv-00631-JCM-NJK  
 10 (the “*Smith* Action”);

11 WHEREAS, on May 18, 2020, Shi, Smith, and Paysign Investor Group each filed a Motion to  
 12 Consolidate, Appoint Lead Plaintiff, and Approve Counsel in the *Shi* Action;

13 WHEREAS, Shi and Smith subsequently withdrew their respective motions;

14 WHEREAS, on May 21, 2020, Smith voluntarily dismissed the *Smith* Action;

15 WHEREAS, Paysign Investor Group’s Motion to Consolidate, Appoint Lead Plaintiff, and  
 16 Approve Counsel (“Paysign Investor Group’s Motion to Consolidate”) is currently pending before the  
 17 Court in the *Shi* Action;

18 WHEREAS, Defendants have accepted service of the Class Action Complaint in the *Shi* Action  
 19 and waived service in the *Chase* Action;

20 **NOW, THEREFORE**, the parties stipulate and agree, subject to the order of the Court, that:

- 21 1. Upon approval of the Court, the *Shi* Action and the *Chase* Action shall be consolidated for all  
 22 purposes under Case No. 2:20-cv-00553-GMN-DJA;
- 23 2. The two above-captioned actions, including but not limited to any obligation to respond to the  
 24 Class Action Complaints in the *Shi* Action and the *Chase* Action, and all discovery and  
 25 disclosure obligations under the applicable federal and local rules, is hereby stayed unless and  
 26 until the Court issues a ruling denying Defendants’ anticipated forthcoming motion to dismiss;
- 27 3. If the Court grants Paysign Investor Group’s Motion to Consolidate, lead plaintiff shall have  
 28 until forty (40) days after service of the Court’s ruling on Paysign Investor Group’s Motion to

Consolidate to file a consolidated class action complaint (the “Consolidated Complaint”).

4. Defendants shall have until sixty (60) days after service of the Consolidated Complaint to file a motion to dismiss (or other responsive pleading).

5. Plaintiffs shall have until forty-five (45) days after service of the motion to dismiss to file their opposition brief.

6. Defendants shall have until thirty (30) days after service of Plaintiffs’ opposition brief to file their reply brief.

**IT IS SO STIPULATED.**

DATED: August 12, 2020

**GREENBERG TRAURIG, LLP**

By /s/ Christopher R. Miltenberger  
Christopher R. Miltenberger  
*Attorneys for Defendants Paysign, Inc., et al.*

DATED: August 12, 2020

**LEVERTY & ASSOCIATES LAW CHTD.**

By /s/ Patrick R. Leverty  
Patrick R. Leverty  
William R. Ginn  
*Attorneys for Plaintiff Yilan Shi*


DATED: August 12, 2020

**POMERANTZ LLP**

By /s/ J. Alexander Hood, II  
Jeremy A. Lieberman  
J. Alexander Hood II  
*Attorneys for Plaintiff Lorna Chase*

**IT IS SO ORDERED.**

DATED this 18 day of August, 2020.

  
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Gloria M. Navarro, District Judge  
United States District Court